

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

**1. CHRISTY BAILEY, Personal Representative)
of the Estate of Jeffrey Peterson)**

Plaintiff,

v.

Case No. 6:20-CV-00327-JAR

**1. CITY OF ADA;
2. OFFICER MARCUS BEALE,
3. OFFICER JUSSELY CANADA,
4. OFFICER MICHAEL MEEKS, and
5. OFFICER PHILLIP VOGT,**

Defendants.

JOINT STATUS DISCOVERY REPORT

The parties respectfully submit the following joint status discovery report pursuant to the Court's Minute Order (Dkt. 85) entered on September 19, 2022:

1. In response to Minute Order requirements Numbers 1, 2 and 3, the parties submit the following:

PARTY ISSUING	TITLE OF DISCOVERY	DATE ISSUED	DATE OF RESPONSE	NUMBER OF PAGES PRODUCED
Plaintiff	Plaintiff's January 11, 2021 Discovery Request to Defendant City of Ada	1/11/2021		
	City of Ada Response		2/22/2021	2 videos; 270 pages. (Bates 1-270)
Defendant City of Ada	Defendant City of Ada's First Set of Interrogatories to Plaintiff	5/17/2021		
	Plaintiff's Response to Defendant City of Ada		3/6/2022	
Defendant Phillip Vogt	Defendant Phillip Vogt's First Set of Interrogatories to Plaintiff	5/17/2021		
	Plaintiff's Response to Defendant Phillip Vogt		3/6/2022	
Defendant Jussely Canada	Defendant Jussely Canada's First Set of Interrogatories to Plaintiff	5/17/2021		

	Plaintiff's Response to Defendant Jussely Canada		3/6/2022	
Defendant Michael Meeks	Defendant Michael Meeks's First Set of Interrogatories to Plaintiff	5/17/2021		
	Plaintiff's Response to Defendant Michael Meeks		3/6/2022	
Plaintiff	Plaintiff's First Set Interrogatories to Defendant City of Ada	5/28/2021		
			9/28/2022	
Plaintiff	Plaintiff's First Set of Interrogatories to the Defendant Officers	5/28/2021		
	Defendant Marcus Beale's Responses to Interrogatories		8/6/2021	
	Defendant Jussely Canada's Responses to Interrogatories		8/31/2021	
	Defendant Phillip Vogt's Responses to Interrogatories		8/31/2021	
	Defendant Michael Meeks's Responses to Interrogatories		9/1/2021	
Plaintiff	Plaintiff's Second Request for Production to Defendants	5/28/2021		
	Defendant City of Ada's Response to Plaintiff's Second Request for Production of Documents to Defendants		9/1/2021	84 pages. (Bates 271-354)
	Defendant City of Ada's Supplemental Response to Plaintiff's Second Request for Production of Documents to Defendants		9/29/22	525 pages. (Bates 468-992)
Plaintiff	Plaintiff's Third Request for Production to Defendant City of Ada	3/25/2022		
	Defendant City of Ada's Response to Third Request for Production		5/3/2022	11 photos; 122 pages (Bates 355-476)
	Defendant City of Ada's Supplemental letter response		6/21/2022	3 pages. (Not Bates Numbered)

2. Concerning Minute Order requirement Number 4, the following witnesses have been deposed:

PARTY ISSUING	DEPOSITION SUBPOENA/NOTICE	DATE REQUESTED	DATE DEPOSED
Plaintiff	Subpoena Megan Timmons	2/21/2022	3/4/2022
Plaintiff	Notice of Depositions:	9/30/2021	
	Defendant Phillip Vogt		10/18/2021
	Defendant Michael Meeks		10/25/2021
	Defendant Jussely Canada		10/26/2021
	Defendant Marcus Beale		9/19/2022
Defendant	Christy Bailey		9/16/22

3. Concerning Minute Order Requirement Number 5, the following witnesses remain to be deposed prior to November 28, 2022 discovery cut off: (a) a Federal Rule of Civil Procedure 30(b)(6) designee of Defendant City of Ada and (b) former City of Ada Police Officer Dewayne Campbell.

4. Concerning Minute Order Requirement Number 6, the parties submit the following list of subpoenas and responses thereto:

PARTY ISSUING	TITLE OF DISCOVERY	DATE ISSUED	DATE OF RESPONSE	NUMBER OF PAGES PRODUCED	NOTES
PR	Ada Police Department Open Records Request	12/6/2019 & 2/6/2020			* sent via probate case
	Ada Police Department Response		2/14/2020	56 pages	
PR	Subpoena to Ada Police Department	3/19/2020			* sent via probate case

	No Response				
PR	Subpoena to City of Ada	3/19/2020			* sent via probate case
	No Response				
Plaintiff	Subpoena to OSBI	1/14/2021			
	OSBI Response		5/8/2021	Case Reports (1,395 pages.); 911 calls, 2 recordings; 6 audio recordings 920 Transmission; Case Master Report (169 pages); multiple video interviews	
	OSBI Supplemental Response		12/6/2021	552 crime scene photos; 16 evidence processing photos	
Plaintiff	Subpoena to OSBI	5/19/2022			
	OSBI Response		9/13/2022	21 DVDs of recorded interviews of officers & witnesses; body cam recordings; 382 crime scene photos; 722 add'l photos; US Alert surveillance footage; raw scans and log files;	
Plaintiff	Subpoena to Ada Police Department	1/15/2021			
	No Response				
Plaintiff	Subpoena to Viewu	12/13/2021			

	Vievu Response		1/20/2022	1 page	
Plaintiff	Subpoena to CLEET	5/19/2022			
	CLEET Response		6/1/2022	1,709 pgs.	

5. Concerning Minute Order Requirement Number 7, the parties submit that there are no discovery issues that should be brought to the Court's attention at this time.

Dated: September 29, 2022.

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CERTIFICATE OF SERVICE

I hereby certify that on September 29 2022, I served a true and complete copy of the foregoing JOINT STATUS DISCOVERY REPORT upon all counsel of record listed below via the CM/ECF system for the United States District Court for the Eastern District of Oklahoma.

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s/Jarrett Adams
Jarrett Adams